

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

**IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

Track One-B

MDL 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL ITS EXHIBIT IN
RESPONSE TO PHARMACY DEFENDANTS' MOTION TO EXTEND
ALL TRACK 1B DEADLINES BY 60 DAYS**

Pursuant to Northern District of Ohio Local Rule 5.2, Plaintiffs Cuyahoga County and Summit County respectfully seek leave from the Court to submit under seal the exhibit attached to its response to Pharmacy Defendants' Motion to Extend All Track 1B Deadlines by 60 Days.

Plaintiffs respectfully request the option to proceed in this manner so there are no inadvertent disclosures of confidential information subject to CMO No. 2 or the ARCos Protective Order.

WHEREFORE, Plaintiffs respectfully requests the Honorable Court to grant Plaintiffs' Motion for Leave to file its Exhibit Under Seal.

Dated: March 25, 2020

Respectfully submitted,

/s/Paul J. Hanly, Jr.

Paul J. Hanly, Jr.

SIMMONS HANLY CONROY

112 Madison Avenue, 7th Floor

New York, NY 10016

(212) 784-6400

(212) 213-5949 (fax)

phanly@simmonsfirm.com

Joseph F. Rice
MOTLEY RICE
28 Bridgeside Blvd.
Mt. Pleasant, SC 29464
(843) 216-9000
(843) 216-9290 (Fax)
jrice@motleyrice.com

Paul T. Farrell, Jr., Esq.
FARRELL LAW
422 Ninth Street, 3rd Floor
Huntington, WV 25701
(304) 654-8281
paul@farrell.law

Plaintiffs' Co-Lead Counsel

/s/Peter H. Weinberger
Peter H. Weinberger (0022076)
SPANGENBERG SHIBLEY & LIBER
1001 Lakeside Avenue East, Suite 1700
Cleveland, OH 44114
(216) 696-3232
(216) 696-3924 (Fax)
pweinberger@spanglaw.com

Plaintiffs' Liaison Counsel

Hunter J. Shkolnik
NAPOLI SHKOLNIK
360 Lexington Ave., 11th Floor
New York, NY 10017
(212) 397-1000
(646) 843-7603 (Fax)
hunter@napolilaw.com

Counsel for Plaintiff Cuyahoga County, Ohio

Linda Singer
MOTLEY RICE LLC
401 9th St. NW, Suite 1001
Washington, DC 20004
(202) 386-9626 x5626
(202) 386-9622 (Fax)
lsinger@motleyrice.com

Counsel for Plaintiff Summit County, Ohio

CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2020, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF system.

/s/Peter H. Weinberger
Peter H. Weinberger (0022076)
Plaintiffs' Liaison Counsel